

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CARLA MOLINA, Administrator of The Estate
of KEVIN D. AGEE, JR., Deceased

Plaintiff,

v.

LAKE ERIE CORRECTIONAL INSTITUTION,
et al.,

Defendants.

Civil Action No. 1:24-cv-00019-DAR

**DEFENDANTS GILBERT AND
MULLINS' JOINDER IN
DEFENDANTS' MOTION TO
DISMISS (DKT. 004)**

Defendants Cassandra Gilbert, R.N. and Linda Mullins, R.N. ("Defendants Gilbert and Mullins") hereby joins Defendants Lake Erie Correctional Institution; CoreCivic, Inc.; Corrections Corporation of America; CoreCivic of Tennessee, LLC; Warden Fender; Warden Mackey; S. Swanson, S. Delisle; D. Jones, C. Stevens-Ingwer; C. Luce; K. Freeman; and A. Sackett's Motion to Dismiss, filed March 4, 2024, (Dkt. 004). Defendants Gilbert and Mullins state that they had not been served at the time of filing of the Motion to Dismiss, but that the Complaint specifies that all counts are alleged against "all Defendants" including both Defendants Gilbert and Mullins in their individual and official capacities. Defendants Gilbert and Mullins hereby join and seek dismissal for the reasoning cited in the Motion and associated briefing.

DATED this 6th day of May 2024.

By: /s/ Timothy J. Bojanowski

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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2024, I electronically transmitted the attached document to the Clerk's Office using the CM/EDF System for filing and transmittal of a Notice of a Electronic Filing to the following CM/ECF registrants:

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